



European Union NFRD Report 2022

Contents

1	Reporting principles
2	Google's business model
2	Environmental initiatives
5	Employee matters
7	Social impact
9	Respect for human rights
13	Data ethics
14	Anti-corruption and bribery matters
15	Conclusion

Reporting principles

We are issuing this report pursuant to the European Union (EU) non-financial reporting directive (NFRD) 2014/95/EU. This report covers the global operations of Google and all its subsidiaries. Google LLC itself is a wholly owned subsidiary of Alphabet Inc. In 2022, Google Sweden AB, Google Denmark ApS, and Google Spain SL are each required to report under Directive 2014/95/EU, according to the Swedish Annual Accounts Act (1995:1554) (Sw.Årsredovisningslagen), the Danish Financial Statements Act Section 99 a and Section 99 d (Årsregnskabsloven), and the Spanish Law 11/2018 which amends Article 49 of the Spanish Commercial Code (Código de Comercio), respectively.

This report includes summary information on Google's environmental initiatives, employee matters, social impact, respect for human rights, data ethics, and anti-corruption and bribery matters. When available, data covers our 2021 fiscal year (January 1 to December 31, 2021). When 2021 data is not yet available, such as for most of our environmental data, data covers our 2020 fiscal year (January 1 to December 31, 2020).

For more detailed information on any of these topics, see Google's [Commitments page](#), which highlights our work across five areas: Protecting users, Expanding opportunity, Building belonging, Responding to crises, and Advancing sustainability. Our [Reports database](#) contains our public reports pertaining to these five areas. Links to additional information about our commitment to corporate responsibility can be found on [Alphabet's Investor Relations page](#).

Google's business model

Google's mission is to organize the world's information and make it universally accessible and useful. Alphabet is a collection of businesses—the largest of which is Google. Google is reported in two segments—Google Services and Google Cloud.

Our Google Services segment generates revenues primarily by delivering both performance advertising and brand advertising. We continue to look to the future and are making long-term investments that we expect to grow revenues beyond advertising, including revenues from Google Play, hardware, and YouTube non-advertising. Our Google Cloud segment generates revenues from fees received for Google Cloud Platform services, Google Workspace collaboration tools, and other enterprise services.

Our headquarters are located in Mountain View, California. We also own and lease office and building space in the surrounding areas near our headquarters. In addition, we own and lease office/building space and research and development sites around the world, primarily in North America, Europe, South America, and Asia. We own and operate data centers in the U.S., Europe, South America, and Asia.

For more information on Google's business model, see [Alphabet's 2021 Annual Report](#).

Environmental initiatives

Climate change is one of the most significant global challenges of our time, and we've long been committed to reducing our environmental impact. Operating Google's business in an environmentally sustainable way has been a core value since our founding.

In 2007, Google committed to being carbon neutral, and we've met this goal every year since then. We reach carbon neutrality via three steps. First, we work to reduce our total energy consumption by pursuing aggressive energy efficiency initiatives. Second, we match 100% of the electricity consumption of our operations with purchases of renewable energy; we're the largest annual corporate purchaser of renewable energy in the world, based on renewable electricity purchased in megawatt-hours. Third, we buy high-quality carbon credits to compensate for any remaining emissions we haven't yet eliminated.

In 2020, we purchased enough renewable energy to match 100% of the electricity we consumed for our global operations for the fourth consecutive year. From 2010 to 2020, Google signed more than 55 power purchase agreements totaling nearly 6 gigawatts of renewable energy that is new to the grid, representing a commitment of approximately \$4 billion through 2034. These deals have resulted in over \$7 billion in investments in renewable energy

projects across the globe. We have agreements in place to purchase energy from four continents.

In 2020, building on what we'd learned and due to the transformation underway in the global energy system, we set a new goal: By 2030 we aim to run our business on carbon-free energy everywhere, at all times. To achieve this, we will need to evolve from matching our annual energy consumption with renewable energy to sourcing carbon-free energy every hour of every day. In 2021, we announced our goal to achieve [net-zero emissions](#) across all of our operations and value chain by 2030. We aim to reduce the majority of our emissions (versus our 2019 baseline) before 2030 and plan to invest in nature-based and technology-based carbon removal solutions to neutralize our remaining emissions.

Google's data centers are the heart of our company, powering products like Search, Gmail, and YouTube for billions of people around the world, 24/7. As part of our climate-related risk assessment, we identified that an example of a potential technology-related risk could be maintaining the environmental performance of data centers as demand for digital products, and the amount of computing power needed to run these applications, increases dramatically. However, we've worked for more than a decade to make Google data centers some of the most efficient in the world and have striven to improve their environmental performance even as demand for our products has dramatically risen. On average, a Google data center is twice as energy efficient as a typical enterprise data center. In 2021, the average annual PUE (power usage effectiveness) for our global fleet of data centers was 1.10, compared with the [industry average of 1.57](#)—meaning that Google data centers use about six times less overhead energy for every unit of IT equipment energy.

At Google, just as we focus on users in designing our products, we focus on our employees in creating healthy workplaces, from our San Francisco Bay Area headquarters to Google offices at diverse sites in more than 180 cities around the world. At the end of 2020, over 1.5 million square meters (17 million square feet) of Google office facilities had achieved Leadership in Energy and Environmental Design (LEED) certification.

We take a science- and community-driven approach to managing land use on our campuses, aiming to positively impact the places where we operate by designing and building our offices with [local ecology](#) and [landscape resilience](#) in mind. For example, we've developed science-based Habitat Design Guidelines, which we apply to our Bay Area campus design process. By the end of 2020, we'd implemented these guidelines across our headquarters, resulting in the planting of nearly 2,200 new native trees and the creation of over a dozen acres of new site-appropriate habitat.

To accelerate the transition to a [circular economy](#), we're working to [maximize the reuse of finite resources](#) across our operations, products, and supply chains and to enable others to do the same. One such project is a software system that we use in our kitchens to track and [reduce pre-consumer food waste](#). This data-driven optimization has helped Google prevent nearly 4.4 million kilograms (9.7 million pounds) of pre-consumer food waste since 2014. To protect our planet and keep it healthy, we need to collectively cut back on food waste—for us at Google, that means doubling down on our efforts to reduce waste in our kitchens and cafes. By 2025, we aim to cut food waste in half for each Googler and send zero food waste to the landfill.

We also put Google technology to work helping others study and respond to environmental challenges. We're working with numerous research and nonprofit organizations to map the world's forests, oceans, watersheds, and air quality, then helping to get that information into the hands of decision-makers. We do this by working with partners to build tools like [Global Forest Watch](#), [Global Fishing Watch](#), [Global Surface Water Explorer](#), [Freshwater Ecosystems Explorer](#), [Environmental Insights Explorer](#), and [Global Fibre Impact Explorer](#).

Through Google.org, we've funded numerous initiatives and organizations to support climate action, access to clean energy, and conservation. For example, in 2020, we launched the [Google.org Impact Challenge on Climate](#), through which Google.org funded €10 million to bold ideas that aim to use technology to accelerate Europe's progress toward a greener, more resilient future.

The highest management level of direct responsibility for our response to climate change rests with the Senior Vice President and Chief Financial Officer of Alphabet and Google, who is responsible for overseeing climate-related issues as she has visibility across all of the company's operations. The [Audit and Compliance Committee](#) of Alphabet's Board of Directors reviews and discusses with management Alphabet's major risk exposures, including financial, operational, data privacy and security, competition, legal, regulatory, compliance, civil and human rights, sustainability, and reputational risks, and the steps Alphabet takes to prevent, detect, monitor, and actively manage such exposures. Primary responsibility for managing climate-related issues is delegated to our Chief Sustainability Officer, who leads sustainability across Google's worldwide operations, products, and supply chain and ensures alignment of our climate strategy across different business units.

For more information about our environmental sustainability initiatives, risk assessments, and key performance indicators, see our [2021 Environmental Report](#) and our [2021 CDP Climate Change Response](#).

Employee matters

We recognize that our employees are our best assets and critical to our continued success. Our ability to compete effectively and our future success depend on our continuing to identify, hire, develop, motivate, and retain highly skilled personnel for all areas of our organization. We invest heavily in hiring talented individuals, and we seek to hire people with diverse backgrounds and perspectives.

Google's [Code of Conduct](#) provides a guide as to how our employees are expected to put Google's values into practice as they pursue the company's mission. This includes respect for one another and for our users. Employees are expected to create and preserve a workplace culture that is free of harassment, intimidation, bias, and unlawful discrimination. Code of Conduct training is provided to all Google employees at all levels of the organization, and we offer unconscious bias training.

In an effort to accelerate our commitments to be a representative, equitable, and respectful workplace, we worked to increase transparency around Googlers' concerns and how we handle them and to increase support for people who raise concerns. In 2019, we updated our Internal Investigations Report to include a section that provides detail about internal sexual harassment investigations as well as expanded sexual harassment scenarios that reflect examples of the types of conduct that may result in termination of employment. We've also publicly shared our [Policy on Harassment, Discrimination, Retaliation, Standards of Conduct, and Workplace Concerns](#) as well as our processes and channels for raising and investigating concerns. A global Investigations Care team, the Employee Assistance Program, workplace accommodations, and leaves are all options available to Googlers who may need them.

In 2020, we announced [new workplace commitments](#) that continue to build on our efforts to handle concerns with care and foster respect in the workplace. This reflects the Alphabet Board's agreement on a series of industry-leading principles and improvements that incorporated input from both employees and stockholders, including the creation of a new Diversity, Equity, and Inclusion (DEI) Advisory Council, which comprises internal senior executives and external DEI experts. The Board reviews the effectiveness of our sexual harassment and retaliation prevention programs and proposed changes.

Building diversity, equity, and inclusion into our workplace, products, and society is at the heart of creating a more helpful Google for everyone. When we get this right, we ensure that everyone feels like they belong at Google and beyond. We believe the greatest contribution we can make is sustained action within our workplace, products, and society.

We continue to focus on developing, progressing, and retaining women and employees from underrepresented communities at all stages of their careers.

For example, in 2021, we hosted a virtual event for employees focused on community-building. The event, called [Transcend: Elevating Women of Color](#), featured 25 speakers from inside and outside Google who talked about their own experiences transcending boundaries. We also hosted an International Women's Day Summit for our employees.

We are also proud to support the Employee Resource Groups (ERGs) that provide additional support and community for underrepresented employees and their allies. Collectively, more than 35,000 employees across 52 countries actively participate as members of our 16 ERGs. These Googler-initiated networks are passionate about promoting diversity, equity, and inclusion at Google.

We are deepening our efforts to hire and retain underrepresented communities at Google, including women in tech all over the world and Black+ and Latinx+ people in the U.S. For example, since we began reporting, representation of women in tech roles at Google has grown from 16.6% in 2014 to 25.9% of our global tech workforce in 2021.

In 2020, we made [new commitments](#) to build a more inclusive and equitable workplace at Google, and we've made significant progress toward those goals. For example, we set a goal to improve leadership representation of Black+, Latinx+, and Native American+ in the U.S. by 30% by 2025. We've already reached our goal, and we're on track to double the number of Black+ Googlers at all other levels in the U.S. by 2025.

For more information on our diversity efforts, see [Google's Diversity Annual Report](#).

When someone joins Google, we seek to provide resources to help them achieve their personal and professional success and well-being, and Google's efforts in these areas are widely known. In fact, in [Universum's 2021 ranking of the World's Most Attractive Employers](#), Google was ranked the number one employer for the 12th consecutive year, as well as number one for Engineering/IT.

We aim to empower employees to act on great ideas regardless of their role or function within the company, and we provide training that helps them develop the skills to do so. We have an e-learning curriculum and conduct "Googler-to-Googler" training sessions, where people learn new skills from their colleagues. Google subsidizes outside studies related to an employee's job responsibilities and—because we believe that fostering curiosity is key to success—also for employees to engage in external training unrelated to their function.

Each year, Googlers can share their feedback about key aspects of our workplace culture and workplace experience in our annual employee engagement survey, known as "Googlegeist." Almost all employees opt in, and the aggregated results are accessible to Googlers at every level of the company. The results are used to surface concerns, and every year, we make changes based on Googlegeist feedback.

In terms of physical resources, we build our offices with the goal of providing our employees with a first-rate work environment, and we engage in a process of continuous re-evaluation with respect to design and functionality to meet the needs of our people.

Employee health is extremely important; we want our employees to live happy and healthy lives, both in and out of work. Our benefits programs are designed to give employees control over their health and well-being and to make it easy for them to take care of themselves and their families. Globally, new parents, regardless of gender, receive a minimum of 18 weeks of fully paid leave to bond with their child (birth parents receive an additional six weeks of pregnancy recovery time).

In addition, all new parents globally benefit from a two-week gradual return policy (ramping back to work part-time at a full-time salary) and can choose flexible working options, such as part-time working and job sharing. We also provide baby-bonding benefits, which is a sum of money given to Googlers who are new parents to help pay for services that support them during the first period of being a parent (e.g., house cleaning, healthy take-out food) to allow them to maximize the time and energy they can spend with their new family member. Parents and caregivers are also able to use 20 days of backup care (refreshed each year), from a provider of their choice when their regular care isn't available.

Social impact

We know that diversity and inclusion are values critical to our success and future innovation. We also know that challenging bias—inside and outside our organization—is the right thing to do. That's why we continue to support efforts that fuel our commitments to progress. These commitments require us to look at bias through a wider lens: at Google, in the industry, and in society. And while progress takes time, our actions today will determine who we are in the future.

Google has set company-wide goals on product accessibility and continues to emphasize disability inclusion in our workforce. In 2019, we held our first ever Global Disability Alliance ERG summit. This gathering was an opportunity for employees from around the world to come together to collaborate and discuss strategies for disability inclusion at work and for improving accessibility in our products and workplace.

In 2019, we participated for the first time in the [Disability Equality Index](#), which serves as a comprehensive benchmarking tool for disability inclusion. We were proud to earn a perfect score on this index in 2019, 2020, and again in 2021, and we're committed to making every Googler feel welcome and included.

Around the world, Google engineers, designers, and marketers are working to understand the needs of communities that have been underrepresented in tech. Because we're building for billions of users who may not look or act or think like the teams building them, we need to make sure we're bringing different perspectives to the table at key points in the process. We are making sustained efforts to drive inclusion by design to enable inclusive products such as the Google Assistant. Launched in 2016 and now available in more than 90 countries and nearly 30 languages, Google Assistant helps more than 500 million people every month to get things done across smart speakers and Smart Displays, phones, TVs, cars, and more. Before launch, the product team worked with our product inclusion team and ERGs to avoid stereotypes, historical biases, offensive language, and hate speech.

We also work with external partners to provide digital skills training for everyone, aimed at helping people find jobs or grow their business and career. For example, our [Grow with Google](#) workshops are designed to help ensure that everyone is able to participate in the digital economy. Our training programs range from basic online skills, like how websites work and how to reach customers with email, to more advanced topics. Google [Career Certificates](#), a program we launched in 2018, is focused on equipping people with job-ready skills in fields like data analytics, IT support, project management, and UX design within three to six months, with no degree or experience required. Based on U.S. survey responses, 75% of program graduates report an improvement in their career within six months of certificate completion.

In 2021, we continued to partner with women's student organizations—as well as student organizations focused on people with disabilities, ethnic minorities, Black+ and LGBTQ+ communities, and other underrepresented demographics—across over 450 universities in North America and EMEA. Also in 2021, Google's Women Techmakers program reached women around the world through over 600 community events and more than 380 speaking engagements designed to provide visibility, community, and resources to help all women in tech thrive. In support of our commitment to racial equity, we also launched the [Black Women in Tech](#) campaign—highlighting the stories, experiences, and expertise of Black women in tech—which has now been viewed by millions of people. Google's Talent Outreach team launched our first virtual International Women's Day series in 2021, engaging more than 6,500 women around the world with talks, panels, and hands-on workshops.

In 2020, to promote equity and inclusion beyond Google, we announced a \$175 million+ economic opportunity package to support Black business owners, startup founders, job seekers, and developers, in addition to YouTube's \$100 million fund to amplify Black creators and artists. Additionally, Google.org pledged \$12 million to support organizations working to advance racial justice. Among them were \$1 million grants each to The Leadership Conference

Education Fund, the NAACP Legal Defense Fund, the NAACP Educational Fund's Policing Reform Campaign, and the Center for Policing Equity.

To support nonprofits in 2020, we committed a total of \$1 billion in Ad Grants. Since 2003, Ad Grants has provided nonprofits with up to \$10,000 per month in free Search ads to help them attract donors, recruit volunteers, and promote their missions. The increased funding went toward nonprofits tackling pressing issues like COVID-19 response and recovery—especially in hard-hit developing economies—and fighting racial injustice around the world.

In March 2021, Google.org launched the global \$25 million Impact Challenge for Women and Girls to support nonprofits and social organizations around the world that are working to advance the economic empowerment of women and girls and create pathways to prosperity. Impact Challenge grantees will receive funding, mentoring from Googlers, Ad Grants, and additional support to bring their ideas to life. Since 2015, Google.org has provided \$92 million to nonprofit organizations supporting gender equity, and the Impact Challenge builds on this long-standing work.

Respect for human rights

We are committed to respecting the human rights enshrined in the [Universal Declaration of Human Rights](#) and its implementing treaties, as well as upholding the standards established in the [United Nations Guiding Principles on Business and Human Rights](#) (UNGPs) and in the [Global Network Initiative \(GNI\) Principles](#).

Google conducts our work on civil rights and human rights through our Human Rights Program, a central function consisting of experts in the field supporting our efforts to ensure that we are meeting our commitment to the UNGPs, GNI Principles, and other civil and human rights instruments. The Human Rights Program develops and advances company-wide strategy on civil and human rights, advises product teams on potential civil and human rights impacts, conducts human rights due diligence, and engages external experts and stakeholders.

Dedicated personnel covering product, regional, and functional areas are responsible for the day-to-day operations of protecting our users and ensuring compliance with legal requirements. Senior management develops the strategy around and oversees the implementation of civil and human rights commitments and GNI Principles at Google and provides relevant updates to the members of our Audit and Compliance Committee in accordance with its Charter, which was amended in 2020 to explicitly include risk oversight of civil and human rights issues. The Audit and Compliance Committee also provides pertinent reports to the full Board of Directors.

We continually enhance and evolve our implementation of our human rights commitments. For example, we established a Human Rights Executive Council to provide oversight and guidance to our Human Rights Program on global human rights and domestic civil rights in the United States. Council members represent key product areas and functions across Google and regularly hear from the leaders of the Human Rights Program. More information on our human rights commitments can be found at [Google: Human Rights](#).

We are founding members of [GNI](#), a multi-stakeholder nongovernmental organization working to advance free expression and privacy. The GNI Principles are informed by the UN Guiding Principles on Business and Human Rights, and they concretize Information and Communication Technology companies' responsibility to respect and protect the freedom of expression and privacy rights of their users. As part of GNI, we work to support and promote human rights, including through improved responsible decision-making, shared learning, and multi-stakeholder collaboration. As a GNI member, Google is subject to a periodic assessment by an independent party to review how the company integrates GNI Principles into our governance, due diligence and risk management, and operational practices. Based on this assessment, the GNI Board determines and [states publicly](#) whether a member company is compliant with its GNI obligations.

At our foundation, Google's Code of Conduct sets forth our expectations for employees regarding privacy, security, freedom of expression, discrimination, harassment, corruption, and compliance with all laws, including anti-modern slavery legislation. The Code encourages employees to raise questions or concerns and to report suspected violations. Employees failing to follow the Code can be subject to disciplinary action, including termination of employment. Failure of a Google contractor, consultant, or other covered service provider to follow the Code in connection with their services to Google can result in termination of their relationship with Google. Our Code of Conduct training reinforces the expectation that employees and members of our external workforce (temporary workers, vendors, and independent contractors)—collectively, “our workers”—follow applicable laws and report concerns of illegal or unethical activity.

We are committed to maintaining a culture that encourages employees and others to report concerns related to violations of our Code of Conduct, policies, or laws, including our human rights commitments. That is why we have adopted and promoted policies that strictly prohibit retaliation of any kind for raising such concerns or for participating in an investigation relating to such concerns. When we learn about a potential violation of our policies or Code of Conduct, we look into the concern consistent with our robust process for carefully investigating such allegations and then make appropriate remedial recommendations. Throughout this process, we keep information, including the identity of the individuals raising the concern, as confidential as possible, sharing only on a need-to-know basis.

Our commitment extends beyond our own practices to those of our suppliers. We have a [Supplier Code of Conduct](#) (the “Supplier Code”), which is based on the [Responsible Business Alliance \(formerly the Electronic Industry Citizenship Coalition\) Code of Conduct](#); international standards, such as the UN Guiding Principles on Business and Human Rights and the Universal Declaration of Human Rights; and our own values. The Supplier Code sets expectations designed to protect the health, safety, and treatment of workers; minimize their environmental impact; combat corruption; respect freedom of association and collective bargaining; comply with minimum wage laws; and prohibit any form of forced, bonded (including debt bondage), or indentured labor, involuntary prison labor, sex trafficking, and slavery or trafficking of people.

We expect our suppliers to source only from conflict-free smelters, such as those that are compliant with Conflict-Free Smelter Program assessment protocols, and work with suppliers to achieve conflict-free sourcing. Alphabet’s [Conflict Minerals Policy](#) directs suppliers to perform due diligence on the source and chain of custody of minerals used to manufacture products for Google.

We believe restrictions on the freedom of expression should be consistent with international human rights laws or standards and the rule of law and be necessary and proportionate for the relevant purpose. We also believe that laws around government surveillance of user information should be [narrowly tailored, transparent, and subject to oversight](#). We publish [Transparency Reports](#), with the mission of sharing data that sheds light on how the policies and actions of governments and corporations affect privacy, security, and access to information. We’re always looking for ways to improve our transparency reporting, and in 2021, we issued supplemental information to our Transparency Report focusing on [geofence warrants in the United States](#).

We also continue to innovate around product-specific transparency with YouTube’s industry-leading transparency reporting on how it enforces the Community Guidelines. We are committed to tackling the challenge of quickly removing content that violates our [Community Guidelines](#) and reporting on our progress. That is why, in April 2018, we launched a quarterly [YouTube Community Guidelines enforcement report](#).

Our Chief Compliance Officer oversees a team focused on combating modern slavery in the company’s supply chains and business operations. The Chief Compliance Officer provides quarterly updates on the status of our Anti-Modern Slavery Program to our Compliance Steering Committee, composed of senior executives from across our business. Regular updates on the status of the Responsible Supply Chain Program—which includes addressing human rights risk, among many other areas—are provided to our Supplier Responsibility Steering Team, composed of our Chief Compliance Officer and leaders from Google’s direct and indirect supply chains.

Our [Policy Against Modern Slavery](#) prohibits knowingly engaging in or supporting human trafficking and child labor practices in our business operations. Any violation of our standards by a Google employee can result in disciplinary action, including termination of employment. Any violation by a supplier can result in contract termination. Our annual Statement Against Modern Slavery, which provides more detail on our efforts to ensure that modern slavery is not taking place in our supply chains and business operations, can be found on our [Supplier Responsibility](#) page.

We perform periodic independent third-party audits at hardware and non-hardware suppliers' facilities. The audits include in-depth tours, meetings with management, worker interviews, document reviews, and assessments of related areas, such as dormitories, cafeterias, wastewater treatment facilities, and warehouses. The audit protocol is designed to assess suppliers' performance in the areas covered by our Supplier Code, including human rights risk. We work with our suppliers to determine root causes and develop corrective action plans for any issues identified during the audit. While our audits are announced, our supplier managers are trained to report any concerns they might observe on an ongoing basis. In 2021, we published our fifth annual [Supplier Responsibility Report](#). This report provides more detailed information about our above-mentioned audit and supplier engagement efforts.

As part of our efforts to identify and mitigate human rights risks in our supply chain, we also conduct due diligence on our direct suppliers and vendors, which include both product and service suppliers, identified as having higher risk through our risk assessments. As part of the due diligence process, suppliers complete a self-assessment questionnaire about their working conditions and management systems. The due diligence process also includes background checks, examination of labor-related red flags that appear in publicly available databases and media sources, and a review of higher-risk suppliers' names against human trafficking watch lists.

If we discover red flags, we remediate these issues and document them. In certain cases, we may decide to no longer pursue a relationship or to terminate our current relationship with a supplier. Our workers who manage relationships with higher-risk suppliers identified in our risk assessment receive supplemental in-person training. In addition, we have an online training course that covers all of the aspects of our Supplier Code for our workers in roles related to hardware supplier management. This training helps our workers identify human rights red flags, shares best practices, and instructs our workers to report human rights concerns.

Certain areas of our business, such as our hardware production, present human rights risks we've been working to eradicate; however, we appreciate that there are risks present in many aspects of our business that we must continue to work to understand and address. Working to mitigate human

rights risk is an ongoing process, and we continually strive to assess this risk in all facets of our business.

Finally, we seek to apply technological innovation to advance social good in the diverse communities and contexts in which we operate. Thus, we support technology-focused social impact projects and provide resources to help nonprofits tackle challenges such as human trafficking, education, and economic development through Google's [AI for Social Good](#) program and [AI Impact Challenge](#).

Data ethics

We strive to protect our users' privacy, free expression, and secure access to the web when they use Google products. We outline how we safeguard privacy and security on our [safety site](#), give users control over their information through [Google Account](#), and detail our efforts toward protecting online expression and access to information in our [statements on freedom of expression](#). We're also committed to complying with Europe's General Data Protection Regulation.

In 2018, we updated and improved our [Privacy Policy](#), making it easier to understand, adding informative videos that explain our practices, and embedding key privacy controls directly in the text. We also updated the privacy and security settings in Google Account, which ensures users can easily see their data and set their preferences for how Google should store and use their information, including pausing or deleting Search or YouTube history or disabling personalized ads. In 2019, we introduced [auto-delete controls](#), which give you the choice to have Google automatically and continuously delete your Location History, search, voice, and YouTube activity data after 3 months or 18 months. In 2020, we made auto-delete the default for our core activity settings and announced [updates](#) to many of our privacy tools, including Google Account controls directly from Search, easier access to Incognito mode, more proactive privacy controls, and others. In 2021, we rolled out [end-to-end encrypted calling](#) between Android phones on Google Fi and new and stronger safe browsing for Android Messages and Chat, and we expanded our [VPN](#) services to 10 more countries. We continue to develop and improve these and other tools to make them more robust and intuitive.

In June 2018, we announced the [Google AI Principles](#) to guide the ethical development of our Artificial Intelligence work. In addition to seven objectives for AI applications, we have identified four AI applications we will not pursue, including designing or deploying AI in technologies whose purpose contravenes widely accepted principles of international law and human rights. The principles serve as an ethical charter that governs our research and product development and impact our business decisions. We [established](#) a formal [review structure](#) to assess new projects, products, and deals for

alignment with the principles. This diverse and inclusive structure includes senior executives, user researchers, social scientists, ethicists, human rights specialists, policy and privacy advisors, legal experts, and senior experts from a variety of other disciplines.

Anti-corruption and bribery matters

Google recognizes that corruption adversely impacts economic growth and disproportionately harms the most vulnerable people and communities around the world.

As with our modern slavery efforts, Google's Chief Compliance Officer oversees a legal team dedicated to preventing corruption in the company's business operations and supply chain. The Chief Compliance Officer provides quarterly updates on the status of our anti-corruption compliance program to the Compliance Steering Committee, and relevant updates to the Audit and Compliance Committee of Alphabet's Board of Directors.

Google's Code of Conduct requires compliance with anti-bribery laws, such as the U.S. Foreign Corrupt Practices Act and the UK Bribery Act 2010. We also have an Anti-Bribery and Government Ethics Policy, which prohibits bribery and facilitation payments in our business operations and requires legal pre-approvals for certain types of government-related expenses. A Google employee, contractor, service provider, supplier, or vendor who directly or indirectly gives, offers, or promises anything of value to anyone, including government officials, with the corrupt intent to obtain or retain any improper advantage will be disciplined up to and including termination of employment or business relationship.

We continually strive to assess corruption risk in all facets of our business. As with other companies in our industry, bribery and corruption risks posed by working with third parties and intermediaries remain a significant corruption risk to Google.

We undertake a number of efforts to mitigate the risk of bribery and corruption both in our company's operations as well as in our supply chain. Below are a few key examples:

- We maintain an anti-bribery third-party due diligence program, where we conduct documented, risk-based due diligence pertaining to the engagement of third parties and channel partners.
- We routinely inform business partners of Google's commitment to abide by anti-bribery laws and seek a reciprocal commitment from them by including anti-corruption compliance language in our contracts.

- We strive to provide risk-based anti-bribery training for employees in relevant functions at all levels of the company. Our Code of Conduct training, which is administered to all employees, contains an anti-bribery module. We also periodically supplement our online trainings with live instruction. In 2021, Google had a Code of Conduct training compliance rate of 99.92% and an anti-corruption training compliance rate of 97.65%.
- We conduct periodic reviews of the anti-bribery compliance program, taking into account relevant developments in the business and field, as well as evolving international and industry standards.
- We conduct periodic and documented testing of relevant controls and sampling of high-risk transactions.
- We implement appropriate processes and due diligence procedures to analyze potential bribery risks associated with proposed mergers and acquisitions, joint ventures, investments, and consortia.
- Finally, as previously mentioned, we maintain multiple reporting channels whereby employees can raise questions or concerns about the Code of Conduct or our anti-bribery policy and report suspected violations.

Google also maintains a policy to implement a risk-based Anti-Money Laundering and Counter Terrorist Financing Program that is reasonably designed to prevent Google from being used to facilitate money laundering and finance terrorist activities. This policy ensures compliance with the Bank Secrecy Act, EU Money Laundering Directives, the Office of Foreign Assets Control, and other related legal obligations.

Financial integrity and fiscal responsibility are core aspects of corporate professionalism. This is more than accurate reporting of our financials, though that's certainly important. Each person at Google—not just those in Finance—has a role in making sure that money is appropriately spent, our financial records are complete and accurate, and internal controls are honored. To make sure that we get this right, Google maintains a system of internal controls to reinforce our compliance with legal, accounting, tax, and other regulatory requirements in every location in which we operate.

Conclusion

In their [first letter to shareholders](#), our founders highlighted Google's goal to "develop services that significantly improve the lives of as many people as possible." This vision continues to guide all of us at Google. We believe in technology's power and potential to have a profoundly positive impact across the world. There is much work that remains to be done, and we will continually strive to achieve this objective.